

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ARTHUR ROBINSON

Plaintiff,

v.

CAVALRY PORTFOLIO SERVICES, LLC

Defendant.

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Case No.

CAVALRY PORTFOLIO SERVICES, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Cavalry Portfolios Services, LLC ("Cavalry") hereby removes the subject action from the District Court of Maryland for Allegany County, Maryland, to the United States District Court for the District of Maryland, on the following grounds:

1. On or about December 28, 2015, Plaintiff Arthur Robinson served Cavalry with a Writ of Summons ("Summons") and Complaint filed in the District Court of Maryland for Allegany County. Copies of the Summons and Complaint are attached hereto, as **Exhibit A** and **Exhibit B**, respectively. No other process, pleadings or orders have been served on Cavalry.

2. Plaintiff alleges that Cavalry violated and is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"), Fair Debt Collection Practices Act, 15 U.S.C. 1692, et seq. ("FDCPA"), and Telephone Consumer Protection Act, 47 U.S.C. 227 et seq. ("TCPA"). *See* Compl., Counts 1, 2 and 4.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA, FDCPA and TCPA, which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the District Court of Maryland for Allegany County to the United States District Court for the District of Maryland.

5. This notice is timely filed with the Court within thirty (30) days after service of the Summons and Complaint on the removing party in the above entitled action pursuant to 28 U.S.C. §1446(b), as Cavalry was served on December 28, 2015.

6. Attached hereto as **Exhibit C** is a true copy of the Notice of Filing Notice of Removal, which was sent to all other parties and the District Court of Maryland for Allegany County.

WHEREFORE, Defendant Cavalry Portfolio Services, LLC, by counsel, removes the subject action from the District Court of Maryland for Allegany County, Maryland to this United States District Court, District of Maryland.

Dated: January 25, 2016

Respectfully submitted,

Andrew M. Williamson
(Fed Bar No. 18721)
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CAVALRY PORTFOLIO SERVICES, LLC.

By: /s/ Andrew M. Williamson
One of its Attorneys

Certificate of Service

I certify that on the **25th day of January, 2016**, I electronically filed and served the foregoing document to all counsel and parties of record and mailed additional service copies to the following parties by certified mail, postage-prepaid:

Arthur Robinson
P.O. Box 1000
Cumberland, MD 21501-100

/s/ Andrew M. Williamson